

**UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY**

NOVARTIS AG, NOVARTIS
PHARMACEUTICALS CORPORATION,

Plaintiffs,

v.

NOVADOZ PHARMACEUTICALS LLC,
MSN PHARMACEUTICALS INC., MSN
LABORATORIES PRIVATE LIMITED,

Defendants.

No. 25-CV-00849-EP-JRA

**NOTICE OF MOTION FOR A STAY OF
INJUNCTION PENDING APPEAL**

PLEASE TAKE NOTICE that, pursuant to Federal Rule of Civil Procedure 62(d), Defendants Novadoz Pharmaceuticals LLC, MSN Pharmaceuticals Inc., and MSN Laboratories Private Limited, (collectively, “MSN”), through their undersigned counsel, on notice to Plaintiffs through their counsel, shall move before the Honorable Evelyn Padin, U.S.D.J. for a stay pending appeal of the March 17, 2025 Opinion and Order granting Plaintiffs’ Motion for a Preliminary Injunction, (ECF Nos. 32, 33).

PLEASE TAKE FURTHER NOTICE that in support of this motion, MSN will rely on the enclosed Memorandum of Law submitted concurrently herewith. A proposed Order and a Certificate of Service also accompany this motion.

Dated: March 24, 2025

Respectfully submitted,

/s/ Rebekah Conroy

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Attorneys for Defendants

CERTIFICATE OF SERVICE

I hereby certify that on this 24th day of March, 2025, I caused a copy of the foregoing to be served upon all counsel of record via ECF notification.

/s/ Rebekah Conroy
Rebekah Conroy